

EXHIBIT A-7

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PENDRICK
CAPITAL PARTNERS
THE REVENUE SOLUTION EXPERTS

Pendrick Capital Partners Agency Requirements and Standard Operating Procedures

Effective Date: 01/25/2016

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12.0 Standard Operating Procedures

It is the responsibility of the Agency to ensure that all appropriate systems accurately reflect all work efforts (calls, contacts, letters, etc.) and consumer communications verbal or written either directly or from indirect sources such as regulatory and credit reporting agencies.

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12.8 Disputes and Validation Requests both Verbal and Written

12.8.1 When possible the Agency is expected to determine the nature of the dispute and identify what validation can be obtained or research can be done to resolve the dispute.

12.8.2 Within 3 business days the agency should follow the process outlined in section 12.5 to request the required media from Pendrick. This includes regulatory complaints that are requesting validation of the debt.

12.8.3 Agency must also include the appropriate Status update in its maintenance file. *The maintenance status update codes are still in development and subject to change but samples can be viewed in exhibit2.*

- 12.8.4** Within 5 business days of receiving the media from Pendrick it must be sent to the consumer. Agency must also include the appropriate Status update in its maintenance file.
- 12.8.5** Agency must allow a reasonable time (Usually one week) for consumer to receive, read and contact the agency for payment or further questions.
- 12.8.6** At this time the agency should attempt to contact the consumer to validate that the account is no longer in dispute and discuss payment options.
- 12.8.7** If the agency is unable to resolve the dispute the account should be closed with the proper close code as outlined in exhibit 2.
- 12.8.8** No collection activity should occur between the receipt of the dispute and the reasonable time allowed for a consumer response.
- 12.8.9** If Agency receives a cease and desist along with a request for debt validation the agency should request the validation from Pendrick according to section 12.5. Agency should send the Itemized bill information to the consumer with a letter acknowledging that they will honor the cease and desist requested, however they did want to provide the information that was requested.
- 12.8.10** If Agency is notified by Pendrick that the dispute is valid then they must immediately cease collection activity, close the account and then notify the consumer as appropriate.
- 12.8.11** Disputed accounts must be tracked and submitted to Pendrick on the monthly dispute log. See Exhibit F.
- 12.8.12** Disputes received after the account is closed with Agency must be sent to Pendrick's VP of Client Relations and Chief Compliance Officer, immediately upon receipt.

12.9 Disputes Credit Bureau Reporting

- 12.9.1** If a dispute is received on an account that is credit reported by the agency all of the steps in section 12.8 must be followed.
- 12.9.2** In addition, the Agency must comply with the FCRA and update the consumers record with all CRA's the account is reported to.
- 12.9.3** The account should not be reported again unless the consumer acknowledges the validity of the debt and rescinds the dispute in writing.

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12.13 Credit Reporting

- 12.13.1** Pendrick Capital Partners has granted the authority to its agencies to report the accounts placed with them for collections.
- 12.13.2** Accounts should not be reported until a minimum of 30 days from placement.
- 12.13.3** When reporting accounts, the K1 segment must list the original creditor not Pendrick.
- 12.13.4** Accounts must include the proper classification code of "02" for medical debt.
- 12.13.5** It is the Agency's responsibility to have processes in place to comply with all FCRA requirements.
- 12.13.6** Agency must have controls in place to provide accurate and timely listings, updates and deletes as well as proper handling of both direct and indirect (CDV) disputes.
 - 12.13.6.1** This includes reporting Paid in Full and Settled in full accurately
- 12.13.7** Accounts in dispute must be reported as a dispute.
- 12.13.8** Agency must provide Pendrick with the proper status update in its regular maintenance file regarding CBR disputes. *Status update codes are still in development but samples can be viewed in exhibit 2.*
- 12.13.9** Agency must immediately delete any account as soon as it is closed or recalled.
- 12.13.10** Agency must not report anything less than 180 days from the Date of Service.
- 12.13.11** Agency must remove any account being paid 100% by insurance
- 12.13.12** If Agency receives one of the identified dispute codes in the placement file without a corresponding code 21021 this account may be credit reported but should only be reported as a disputed accounted. *Status update codes are still in development but samples can be viewed in exhibit 2.*

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